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June 1, 2012

Via Facsimile (856) 757-6846

Honorable Karen M. Williams
United States Magistrate Judge
U.S. District Court for the District of NJ
Mitchell H. Cohen Building & U.S.
Courthouse
4th & Cooper Streets- Courtroom 5C
Camden, New Jersey 08101

Re: Michael French v. Trooper J.T. Squire-Tibbs, et al.
Docket No.: 1:11-cv-01009-JEU-KMW

Dear Judge Williams:

We represent defendant Trooper J.T. Squire-Tibbs (Trooper Squire-Tibbs) in this action. We submit this letter to request that Your Honor revise the Court's May 3, 2012 Amended Scheduling Order Removing the Case from Arbitration ("Scheduling Order") to permit the deposition of Plaintiff's medical expert, Bruce H. Grossinger, D.O., CIME.

During the most recent teleconference with Your Honor, all counsel represented that we did not anticipate the need for expert depositions. At that time, Plaintiff had not yet identified any experts or served any reports. However, after receiving the report of Dr. Grossinger on May 30th, we would like to pursue his deposition.

Completing the deposition of Dr. Grossinger should not delay the current schedule Your Honor put in place. Plaintiff's expert reports were due yesterday, May 31, 2012, and no other reports were served. Trooper Squire-Tibbs' expert reports are

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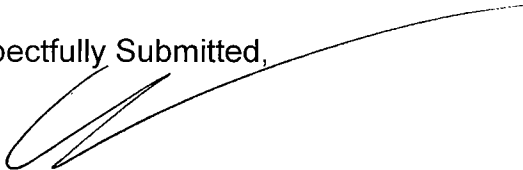
WOLFF SAMSON

June 1, 2012
Page 2

due on July 20, 2012. Finally, dispositive motions must be served by September 10, 2012. As such, the deposition of Dr. Grossinger could take place sometime between July 20th and the end of August without the need to alter the current Scheduling Order.

We are available for a telephone conference to discuss this matter, and we thank Your Honor for Your courtesies in this regard.

Respectfully Submitted,

A handwritten signature in black ink, consisting of a large, sweeping 'C' followed by a series of loops and a long horizontal stroke extending to the right.

CHRISTOPHER R. PALDINO

cc: (via facsimile and regular mail)
Graham Baird, Esq.